

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.

IN THE MATTER OF

Accelerating Wireless Broadband Deployment
by Removing Barriers to Infrastructure
Investment

WT Docket No. 17-79

Revising the Historic Preservation Review
Process for Wireless Facility Deployments

WT Docket No. 15-180

**COMMENTS OF STATES AND CALIFORNIA NEVADA CHAPTER
OF THE NATIONAL ASSOCIATION OF TELECOMMUNICATIONS
OFFICERS AND ADVISORS (SCAN NATOA, INC.)**

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SCAN NATOA, Inc. (“SCAN”) offers these comments in response to the Notice of Proposed Rulemaking and the Notice of Inquiry in this matter. SCAN has a history spanning over 20 years representing the interests of over 250 members primarily consisting of local government telecommunications officers and advisors located in California and Nevada. Accordingly, SCAN’s members have a keen interest and stake in this proceeding and its outcome.

SCAN incorporates its comments (Exhibit “A”) and reply comments (Exhibit “B”) in the Mobilite petition, attached hereto. Of note, the Commission should, in lieu of issuing new or amended rules, follow its staff’s prior recommendations and form a task force or advisory board to consider best practices for deployments in the public rights-of-way.

In the National Broadband Plan issued in 2012, Commission staff recommended that the Commission “should establish a joint task force with state, Tribal and local policymakers to craft guidelines for rates, terms and conditions for access to public rights-of-way.”¹ More recently, in January 2017, Chairman Pai announced that he would form a similar task force, the Broadband Deployment Advisory Committee (“BDAC”), to develop an administrative record and recommend best practices to accelerate wireless deployments.²

Any new or amended regulations at this time would be detrimental to any joint task force or advisory board, especially given that Chairman Pai intends his BDAC to “draft for the Commission’s consideration a model code for broadband deployment.”³ Such a task force may

¹ See FCC, CONNECTING AMERICA: THE NATIONAL BROADBAND PLAN 131 (2012) *available at*: <https://www.fcc.gov/general/national-broadband-plan>.

² See Chairman Ajit Pai, *Formation of the Broadband Deployment Advisory Committee (BDAC)* (Jan. 31, 2017), *available at*: http://transition.fcc.gov/Daily_Releases/Daily_Business/2017/db0131/DOC-343243A1.pdf [hereinafter “BDAC Statement”].

³ See *BDAC Statement* at 1.

not be able to engage in a robust review and discussion if it were formed after the Commission adopts new or amended regulations.

Respectfully submitted,

Dated: March 8, 2017

_____/s/ Javan N. Rad_____
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